

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**MOTION FOR LEAVE TO FILE SURREBUTTAL TESTIMONY  
OF DEBORAH S. WALDBAUM**

AT&T Communications of New England, Inc. ("AT&T") requests that the Department allow AT&T to file Supplemental Surrebuttal Testimony of Deborah S. Waldbaum in order to respond to the information provided by Verizon Massachusetts ("Verizon") on November 2, 2001, in its supplemental response to ATT-VZ 2-8. When Ms. Waldbaum filed surrebuttal testimony on November 1, 2001, Verizon had not yet responded in full to ATT-VZ 2-8. Rather than extending the procedural schedule, AT&T filed Ms. Waldbaum's surrebuttal testimony according to the deadline, and reserved its right to file supplemental testimony regarding any issues raised by Verizon's supplemental response.

ATT-VZ 2-8 requested a list of the telephone numbers attributable to AT&T in the E911 database. In its supplemental response to this information request, Verizon provided a compact disk with the statewide E911 records for AT&T as of October 30, 2001. Ms. Waldbaum used this information to investigate the accuracy of Robert Mudge's statements regarding number counts based on the E911 database. Ms. Waldbaum's supplemental surrebuttal testimony presents the results of this investigation which revealed that the E911 database is likely to overstate substantially the extent of CLEC competition, as opposed to Mr. Mudge's statement

that the E911 database understates CLEC competition. Mr. Waldbaum's testimony, therefore, will aid the Department in its analysis of Verizon's reliance on the E911 database to measure competition in Massachusetts.

WHEREFORE, AT&T requests that the Department allow AT&T to file Supplemental Surrebuttal Testimony of Deborah S. Waldbaum.

Respectfully submitted,

**AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.**

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